

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	Case No.: 23-13220 MDC
MOHAMMAD ALQTAISHAT,	Chapter: 13
Debtor	
COMMUNITY LOAN SERVICING, LLC f/k/a BAYVIEW LOAN SERVICING, LLC,	
Movant	
Respondent.	

**OBJECTION OF COMMUNITY LOAN SERVICING, LLC F/K/A BAYVIEW LOAN
SERVICING, LLC TO DEBTOR'S CHAPTER 13 PLAN**

AND NOW COMES, Community Loan Servicing, LLC f/k/a Bayview Loan Servicing, LLC ("Mortgagee"), secured creditor and mortgage lien holder on real property owned by Debtor(s) and located at 456-458 Markle Street, Philadelphia, PA 19128 ("the Property"), by its attorneys, Fein, Such, Kahn & Shepard, P.C., Tammy L. Terrell Benoza, Esq., who hereby aver as follows:

1. Mortgagee is a secured creditor by way of a mortgage representing a lien on the Property.
2. Debtor filed the instant Chapter 13 Bankruptcy Petition on October 26, 2023.
3. Mortgagee will file a Proof of Claim on or before January 4, 2024.
4. As of the date of the filing of the instant Chapter 13 petition, the Debtor had estimated mortgage arrears of \$35,357.59.

5. Debtor's Chapter 13 Plan provides for payment of mortgage arrears of only \$4,000.00.

WHEREFORE, Community Loan Servicing, LLC f/k/a Bayview Loan Servicing, LLC prays and respectfully requests that the Debtor be required to file an Amended Chapter 13 Plan providing for full payment of arrears due to the Mortgagee.

Date: December 11, 2023

By: /s/ Tammy L. Terrell Benoya
Tammy L. Terrell Benoya, Esq.
Court I.d. No. 20271989